

PROCEDURE COMMENTS

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CALLAWAY PLANT
ADMINISTRATIVE PROCEDURE
APA-ZZ-00700
FIRE PROTECTION PROGRAM

RESPONSIBLE DEPARTMENT ENGINEERING

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APPROVED BY _____

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This procedure contains the following:

Pages	<u>1</u>	through	<u>8</u>
Attachments	_____	through	_____
Tables	_____	through	_____
Figures	_____	through	_____
Appendices	<u>1</u>	through	<u>2</u>
Checkoff Lists	_____	through	_____

This procedure has _____ checkoff list(s) maintained in the mainframe

Conversion of commitments to TRS reference/hidden text completed by Revision

ITS Commitments 010 Non-T/S Commitments 010

DEFICIENCY LIST

Section	Deficiency Description	Constraints

TABLE OF CONTENTS

<u>Section</u>		<u>Page Number</u>
1	PURPOSE AND SCOPE	1
1.1	PURPOSE	1
1.2	SCOPE	1
2	RESPONSIBILITIES	1
2.1	MANAGER, NUCLEAR ENGINEERING	1
2.2	SUPERINTENDENT, PROTECTIVE SERVICES	1
2.3	SUPERINTENDENT, DESIGN ENGINEERING	3
2.4	SUPERINTENDENT, SYSTEM ENGINEERING	5
2.5	SUPERINTENDENT, TRAINING	5
2.6	SUPERINTENDENT, OPERATIONS	6
2.7	SUPERINTENDENT, SECURITY	6
2.8	ALL DEPARTMENTS	6
3	FIRE PROTECTION PROGRAM	6
4	REFERENCES	6
5	RECORDS	8
Appendix 1 -- Fire Protection Program.....		1 Page
Appendix 2 -- Fire Protection Program Documents		1 Page

FIRE PROTECTION PROGRAM

1 PURPOSE AND SCOPE

1.1 PURPOSE

1.1.1 Defines the overall responsibilities for development and implementation of the Callaway Plant Fire Protection Program.

1.1.2 The purpose of the program is to ensure that a fire will not prevent safe shutdown of the plant and will not endanger the health and safety of the public.

1.2 SCOPE

1.2.1 This procedure lists the positions and responsibilities of the Fire Protection Program.

1.2.2 See Appendix 1 for an organizational chart.

1.2.3 See Appendix 2 for Fire Protection Program Documents.

2 RESPONSIBILITIES

2.1 MANAGER, NUCLEAR ENGINEERING

The Manager, Nuclear Engineering, is responsible for the overall Fire Protection Program and has the authority to delegate responsibilities and obtain assistance to ensure all fire protection requirements are met. **(FSAR 9.5.1.7, FSAR 9.5-A, OQAM 1.0)**

2.2 SUPERINTENDENT, PROTECTIVE SERVICES

2.2.1 The Superintendent, Protective Services, is responsible for the following:

2.2.1.1 Providing appropriate oversight of the Fire Marshal.

2.2.1.2 Employing a Fire Marshal knowledgeable in fighting fires and in the use of fire fighting equipment present at Callaway Plant.

2.2.2 Fire Marshal

The Callaway Plant Fire Marshal is responsible for:

- Assuring availability and acceptability of fire fighting equipment. Testing and inspecting fire-fighting equipment requires the generation and implementation of Preventive Maintenance Tasks. Fire fighting equipment consists of: **(FSAR 9.5.1.8, FSAR 9.5-E, FSAR 9.5.1.7.1, FSAR 9.5.1.7.2 , FSAR 9.5.1.7, FSAR 9.5.1.5, 29 CFR 1910.157C, 10 CSR 25-5.262.2.C.2.G)**

2.2.2.1

- Fire Brigade Equipment
- Plant Fire Extinguishers
- Plant Fire Hose Stations
- Plant Fire Hoses

2.2.2.2 Developing, implementing, and administering the Fire Protection Training Program for all Fire Brigade Members, Fire Brigade Leaders, and Hot Work Fire Watches. (**FSAR 9.5.1.7.5, FSAR 9.5.1.5**)

2.2.2.3 Scheduling, conducting, and critiquing Fire Brigade drills and developing fire drill objectives. (**FSAR 9.5.1.7.5**)

2.2.2.4 Performing a periodic review of the Fire Brigade roster and initiating changes as needed. (**FSAR 9.5.1.7.5**)

2.2.2.5 Ensuring procedural controls exist that assure the availability and acceptability of emergency breathing apparatus for Fire Brigade use. (**FSAR 9.5.1.7.1**)

2.2.2.6 Maintaining Fire Training program records for members of the Fire Brigade and other plant personnel. (**FSAR 9.5.1.7.5**)

2.2.2.7 Ensuring that a program is established and maintained that provides Health Physics support to the Fire Brigade in the event of a fire in a radiological controlled area. (**FSAR 9.5.1.7.8**)

2.2.2.8 Developing and maintaining a set of prefire strategy procedures. (**FSAR 9.5.1.7.8, FSAR 9.5.1.9**)

2.2.2.9 Conducting fire investigations and post-event reviews to determine root causes and necessary corrective actions.

- 2.2.2.10 Establishing and maintaining a Fire Brigade and Fire Team organization.
- 2.2.2.11 Establishing and maintaining Fire Brigade response capabilities.
- 2.2.2.12 Assuring prompt and effective corrective actions are taken to correct conditions adverse to fire protection and preclude their recurrence. **(FSAR 9.5.1.7.1)**
- 2.2.2.13 Coordination and administration of Callaway Plant/Off-Site Emergency Team activities including non-medical readiness, training, and drills.
- 2.2.2.14 Coordination and administration of Callaway Plant/corporate non-medical emergency response interfaces.
- 2.2.2.15 Periodically policing areas of the plant to assure plant-wide compliance with the housekeeping and fire protection programs. The Fire Marshal is also responsible for initiating corrective action when non-compliance is observed. **(FSAR 9.5.1.7.1)**
- 2.2.3 Safety Supervisor

The Safety Supervisor is responsible for the following:

 - 2.2.3.1 Conducting and documenting all Hot Work Fire Watch Training. (T66.0050.06) (**29 CFR 1910.157.C**)
- 2.3 SUPERINTENDENT, DESIGN ENGINEERING
 - 2.3.1 The Superintendent, Design Engineering, or designee, is responsible for the following:
 - 2.3.1.1 Providing design engineering support when appropriate. **(FSAR 9.5.1.7.2)**
 - 2.3.1.2 Acting as the primary contact for auditing agencies.
 - 2.3.1.3 Assisting the Fire Marshal as needed to resolve fire fighting equipment issues.
 - 2.3.1.4 Assisting the Fire Marshal in investigating the root cause of fire events and associated corrective actions.

- 2.3.1.5 Employing an engineer who is a graduate of an engineering curriculum of accepted standing and who SHALL have completed at least six years of engineering achievement, three of which SHALL have been in responsible charge of fire protection engineering. These requirements are the eligibility requirements for full membership in the Society of Fire Protection Engineers. **(FSAR 13.1.1.3.1, FSAR 9.5.1.5)**
- 2.3.1.6 Fire Barriers, which include:
- Fire rated walls, floors & ceilings
 - Fire rated assemblies, such as doors, dampers, seals, etc. that allow penetration of a fire rated wall, floor, or ceiling
 - Fire stops and wraps
 - Fire retardant coatings
- 2.3.1.7 Maintaining separation of safe shutdown circuits.
- 2.3.2 Fire Protection Engineer
- The Callaway Plant Fire Protection Engineer is responsible for:
- 2.3.2.1 Establishing and maintaining a program to minimize and control fixed combustibles and to evaluate the ability to achieve safe shutdown following a fire. **(FSAR 9.5.1.7.1, FSAR 9.5.1.7.5)**
- 2.3.2.2 Establishing and maintaining a program to ensure transient fire loads are evaluated, documented, and controlled. **(FSAR 9.5.1.7.1, FSAR 9.5.1.7.2)**
- 2.3.2.3 Establishing and maintaining a program to control modifications and administrative changes that may impact the fire protection program. **(FSAR 9.5.1.7.12)**
- 2.3.2.4 Reviewing all changes to the approved Fire Protection Program. **(FSAR 9.5.1.7.12)**
- 2.3.2.5 Maintaining and approving the appendices attached to this procedure.
- 2.3.2.6 Establishing and maintaining a program to control ignition sources and ensure hot work is identified, documented, and controlled.

2.4 SUPERINTENDENT, SYSTEM ENGINEERING

The Superintendent, Systems Engineering, is responsible for the following:

2.4.1 Ensuring the responsibilities for a system engineer are upheld for emergency lighting, plant communication, and all Fire Protection Systems and Components. Fire Protection Systems and Components consist of: (**FSAR 9.5.1.7.1, FSAR 9.5.1.7.2**)

- a) Sprinkler, Spray, and Gas Suppression Systems
- b) Detection Systems
- c) Fire Protection Circuitry and Alarms
- d) Fire Protection Pumps, Tanks, Valves, and Piping

2.4.2 Ensuring that surveillances on fire protection systems and components are conducted. (**FSAR 9.5.1.7.2, FSAR 9.5.1.7**)

2.4.3 Establishing and maintaining a program to control impairments to Fire Protection Systems and Components. (**FSAR 9.5.1.7**)

2.4.4 Establishing and maintaining a program to control impairments to Fire Barriers.

2.5 SUPERINTENDENT, TRAINING

2.5.1 The Superintendent, Training, or his designee, is responsible for the following:

2.5.1.1 Ensuring that General Employee Training (GET) for all personnel gaining Unescorted Access to the Protected Area is developed, implemented, and administered. A portion of this training SHALL include: (**FSAR 9.5.1.7.8, FSAR 9.5.1.7.6**)

- Indoctrination in appropriate procedures which implement the Fire Protection Program
- Instruction on the proper handling of applicable accidental events that impact Fire Protection
- An educational program about the proper use of fire extinguishers

2.6 SUPERINTENDENT, OPERATIONS

The Superintendent, Operations, or his designee, is responsible for ensuring that sufficient qualified Fire Brigade personnel are identified at the beginning of each shift. (**FSAR 9.5.1.7.5**)

- 2.6.1 The Superintendent Operations, or his designee, is responsible for the administration of Fire Brigade Operations and Conduct.

2.7 SUPERINTENDENT, SECURITY

The Superintendent, Security, or his designee, is responsible for developing, implementing, and administering the Fire Watch Program.

2.8 ALL DEPARTMENTS

All departments are responsible to provide the Fire Protection Engineer the opportunity to review any changes to the approved Fire Protection Program. (**FSAR 9.5.1.7.12**)

3 FIRE PROTECTION PROGRAM

The Callaway Plant Fire Protection Program is based on the documents listed in Appendix 2. Changes to any of these documents are considered changes to the approved Fire Protection Program. (**FSAR 9.5.1.12, T/S AC 6.8.1, IMPROVED T/S AC 5.4.1, OL 2.C(5)(C), FSAR 9.5-A**)

4 REFERENCES

- 4.1 **FSAR, Standard Plant Practice, Sections 9.5.1, FSAR 9.5.2, FSAR 9.5.3, and Appendices 9.5-A through E.**
- 4.2 **FSAR, Site Addendum, Sections 9.5.1, FSAR 9.5.2, and Appendices 9.5-A through E.**
- 4.3 The Fire Protection Program as described in the Safety Evaluation Report (SER) through Supplement 4.
- 4.4 **APA-ZZ-00010 - Conduct of Operations - Operations**
- 4.5 **APA-ZZ-00330 - Preventive Maintenance Program**

- 4.6 **APA-ZZ-00340** - Surveillance Program Administration
- 4.7 **APA-ZZ-00701** - Control of Impairments of Fire Protection Systems and Components
- 4.8 **APA-ZZ-00703** - Fire Protection Operability Criteria and Surveillance Requirements
- 4.9 **APA-ZZ-00741** - Control of Combustible Materials
- 4.10 **APA-ZZ-00742** - Control of Ignition Sources
- 4.11 **APA-ZZ-00743** - Fire Team Organization and Duties
- 4.12 Housekeeping and Material Condition Policy
- 4.13 **EDP-ZZ-04044** - Fire Protection Reviews
- 4.14 **EIP-ZZ-00226** - Fire Response Procedure for Callaway Plant
- 4.15 **EIP-ZZ-03010** - Hazardous Chemical/Oil Spill Response Implementing Procedure
- 4.16 **ETP-QF-03000** - Plant Public Address System Test
- 4.17 **FPP-ZZ-0XXXX** - Series of Procedures, Pre-Fire Strategy Procedures
- 4.18 **HDP-ZZ-08000** - Respiratory Protection Program
- 4.19 **HTP-ZZ-05006** - Fire Involving Radioactive Material or Entry into the RCA
- 4.20 **OTS-QD-00001** - Emergency Lighting Tests
- 4.21 **SDP-KC-00001** - Requirements for and Duties of Compensatory Fire Watches
- 4.22 **TDP-ZZ-00050** - General Employee Training
- 4.23 **FSAR 9.5.1.9, FSAR 9.5.1.7.1, FSAR 9.5.1.7**

5 RECORDS

5.1 QA RECORDS

5.1.1 None

5.2 COMMERCIAL RECORDS

5.2.1 None